

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re

Alexander E. Jones,

Debtor,

Bankruptcy

Case No. 22-33553 (CML)

Chapter 11

In re

Free Speech Systems LLC,

Debtor,

Bankruptcy

Case No. 22-60043 (CML)

Chapter 11

Neil Heslin, Scarlett Lewis, Leonard Pozner,
Veronique De La Rosa, and Estate of
Marcel Fontaine,

Plaintiffs,

v.

Alexander E. Jones and Free Speech Systems LLC,
Defendants.

Adv. Pro. No.: 23-03034 (CML)
23-03035 (CML)

David Wheeler, Francine Wheeler, Jacqueline
Barden, Mark Barden, Nicole Hockley, Ian Hockley,
Jennifer Hensel, Donna Soto, Carlee Soto-Parisi,
Carlos M. Soto, Jillian Soto Marino, William
Aldenberg, William Sherlach, Robert Park, and
Richard M. Coan, as chapter 7 trustee for the estate
of Erica Lafferty,

Plaintiffs,

v.

Alexander E. Jones and Free Speech Systems LLC,
Defendants.

Adv. Pro. No. 23-03036 (CML)
23-03037 (CML)

**NOTICE OF HEARING ON EMERGENCY MOTIONS OF THE TEXAS
AND CONNECTICUT PLAINTIFFS FOR ENTRY OF AN ORDER
(A) SCHEDULING CERTAIN DATES AND DEADLINES,
(B) ESTABLISHING CERTAIN PROTOCOLS IN CONNECTION
WITH SUCH HEARINGS, AND (C) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on March 24, 2023, the Texas Plaintiffs¹ filed their *Emergency Motion of the Texas Plaintiffs for Entry of an Order (A) Scheduling Certain Dates and Deadlines, (B) Establishing Certain Protocols in Connection with Such Hearings, and (C) Granting Related Relief* [Docket No. 7 in Adv. Pro. Case Nos. 23-03034 (CML) and 23-03035 (CML)] (the “Texas Plaintiffs’ Motion”) and the Connecticut Plaintiffs filed their *Emergency Motion of the Connecticut Plaintiffs for Entry of an Order (A) Scheduling Certain Dates and Deadlines, (B) Establishing Certain Protocols in Connection with Such Hearings, and (C) Granting Related Relief* [Docket No. 16 in Adv. Pro. Case Nos. 23-03036 (CML) and 23-03037 (CML)] (the Connecticut Plaintiffs’ Motion, and together with the Texas Plaintiffs’ Motion, the “Texas and Connecticut Plaintiffs’ Motions”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Texas and Connecticut Plaintiffs’ Motions will be held on **Tuesday, April 4, 2023 at 11:00 a.m. (CST)** before the Honorable Christopher M. Lopez, United States Bankruptcy Judge, 515 Rusk, 4th Floor, Courtroom 404, Houston, Texas 77002 (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that this hearing will be conducted in person, by telephone, and by remote video conference. Parties wishing to participate in the hearing telephonically may do so by dialing **1-832-917-1510** and entering conference code **590153** when prompted. Parties may also participate via remote video conference by going to <https://www.gotomeet.me/JudgeLopez> and clicking the “join the meeting” button. Audio connects by phone are required for all video participants.

¹ Defined terms used, but not defined herein, have the meanings ascribed to them in the Texas and Connecticut Plaintiffs’ Motions.

Dated: March 31, 2023

MCDOWELL HETHERINGTON LLP

By: /s/ Avi Moshenberg

Avi Moshenberg
State Bar No. 24083532
1001 Fannin Street, Suite 2700
Houston, Texas 77002
Telephone: (713) 337-5580
Fax: (713) 337-8850
E-mail: Avi.Moshenberg@mhlhp.com

**CHAMBERLAIN, HRDLICKA,
WHITE, WILLIAMS & AUGHTRY, PC**

By: /s/ Jarrod B. Martin

Jarrod B. Martin
State Bar No. 24070221
1200 Smith Street, Suite 1400
Houston, Texas 77002
Telephone: (713) 356-1280
Fax: (713) 658-2553
E-mail: jarrod.martin@chamberlainlaw.com

WILLKIE FARR & GALLAGHER LLP

By: /s/ Jennifer J. Hardy

Jennifer J. Hardy
State Bar No. 24096068
600 Travis Street
Houston, Texas 77002
Telephone: (713) 510-1766
Fax: (713) 510-1799
E-mail: jhardy2@willkie.com

WILLKIE FARR & GALLAGHER LLP

Rachel C. Strickland (admitted *pro hac vice*)
Stuart R. Lombardi (admitted *pro hac vice*)
Ciara A. Sisco (admitted *pro hac vice*)
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 728-8000
Fax: (212) 728-8111
E-mail: rstrickland@willkie.com
E-mail: slombardi@willkie.com
E-mail: csisco@willkie.com

Co-Counsel to the Texas Plaintiffs

CAIN & SKARNULIS PLLC

By: /s/ Ryan E. Chapple

Ryan E. Chapple
State Bar No. 24036354
303 Colorado Street, Suite 2850
Austin, Texas 78701
Telephone: (512) 477-5000
Fax: (512) 477-5011

Counsel to the Sandy Hook Families

KOSKOFF KOSKOFF & BIEDER PC

Alinor C. Sterling (admitted *pro hac vice*)
350 Fairfield Avenue
Bridgeport, Connecticut 06604
Telephone: (203) 336-4421

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

Kyle J. Kimpler (admitted *pro hac vice*)
Christopher Hopkins (admitted *pro hac vice*)
Daniel S. Sinnreich (admitted *pro hac vice*)
Daniel A. Negless (admitted *pro hac vice*)
Briana P. Sheridan (admitted *pro hac vice*)
1285 Avenue of the Americas
New York, New York 10019-6064
Telephone: (212) 373-3000
Fax: (212) 757-3990

*Counsel to the Sandy Hook Families other
than Richard M. Coan, as chapter 7 trustee
for the estate of Erica Lafferty*

ZEISLER & ZEISLER, PC

Eric Hensy (admitted *pro hac vice*)
10 Middle Street, 15th Floor
Bridgeport, Connecticut 06604
Telephone: (203) 368-5495

*Counsel to Richard M. Coan, as chapter 7
trustee for the estate of Erica Lafferty*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Hearing has been served on counsel for the Debtor, the Debtor, and all parties receiving or entitled to notice through CM/ECF on this 31st day of March, 2023.

/s/ Jennifer J. Hardy
Jennifer J. Hardy